

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 11, 2010

Name of company covered by this certification: T/A Apartment Services dba Veracity Communications

Form 499 Filer ID: 804390

Name of signatory: Mike Jasper

Title of signatory: Vice President of Customer Service

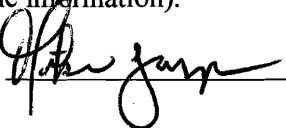
I, Mike Jasper, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed



CUSTOMER PROPRIETARY NETWORK INFORMATION
OPT-OUT NOTICE AND NOTICE OF REGULATORY CHANGES

Date: February 11, 2010

Veracity Communications has always been committed to safeguarding its Customer's Information and protecting Customers' privacy. In furtherance of this commitment, Veracity Communications complies with federal laws regarding the protection of customer account information, also known, under Federal law as "Customer Proprietary Network Information" or CPNI.

At Veracity Communications we refer to this information as "account information." Account information includes information about a customer's services and their use of those services, as well as general billing information, such as account number, telephone number, bill amount and address. Information that pertains to the transmission of specific telephone calls, such as the number called (or called from), the time, location or duration of a call is called "call-detail information." Under federal and state law Veracity Communications is obligated to preserving the confidentiality of this information, and Veracity Communications is committed to doing so.

Opt-Out. In order to better serve your specific communication needs, and to provide you with access to innovative products and services, we would like to share some of your CPNI with affiliates within Veracity Communications corporate family. You have a right to keep your CPNI private by "opting-out". You may opt out by contacting us by telephone at 801-379-3000, by mail at 379 N University Ave, Provo, UT 84601. Unless you provide us with notice that you wish to opt out within thirty (30) days of us providing this notice to you, we will assume that you give Veracity Communications the right to share your CPNI with its affiliates. **CPNI will not be shared with unrelated third parties unless required by law to do so.** If you do not "opt out" your consent will remain valid until we receive a notice expressing your intent to opt out.

Recent Regulatory Changes. Recently, the Federal Communications Commission (FCC) has implemented changes in its rules regarding CPNI. The FCC now requires that carriers implement stricter procedures to verify the identity of callers who want to discuss call-detail information or to engage in online transactions that would allow access to account information generally.

New Rules for Access to CPNI.

Calls By Customer to Customer Service: Previously, carriers were permitted to discuss customers' service and billings (including call detail information) once the carrier had verified the caller's identity through questions about account information know to the Company and customer (such as social security number). However, under the new rules, carriers are prohibited from releasing call detail information based on customer-initiated telephone

contact, except under the following circumstances: (1) when a customer provides a pre-established password; (2) when a customer requests that the information be sent to the customer's address of record; or (3) when a carrier calls the telephone number of record and discloses the information. Additionally, when a customer provides the call detail to the Company representative without any assistance from the carrier, the Company representative is permitted to discuss the call detail information provided by the customer.

Online Access to Account Information: Prior to allowing a customer online access to Account Information, the Company must authenticate a customer without the use of account information or readily available biographical information, such as social security number, mother's maiden name, home address or date of birth. Therefore, Customers seeking online access to account information need a password before access can be permitted. Veracity Communications is providing new customers with security codes they can use to establish online accounts. For customers who already have online access to their account the Company is validating the "My Account" profiles of existing customers. For many customers with existing "Account" profiles, this will require that they request a new security code from Veracity Communications and use it as explained on the "My Account" site.

Access to Account Information at Retail Locations: Customers seeking access to account information at Company retail outlets will need to produce a valid photo ID (generally a driver's license or other ID issued by a government).

Notifications of Certain Account Changes. In addition to changes outlined above regarding access account information, the Company will be notifying customers whenever a password, customer response to a back-up means of authentication for lost or forgotten password (such as a secret question and answer), online account, or address of record is created or changed. of certain account changes. These notifications may be sent to a postal or e-mail address, or by telephone, voicemail or text message.

Business Relationships and Exemption From the Rules. Veracity Communications' practices with respect to CPNI access and required notifications will essentially be the same for our residential and small business customers. However, in cases where Veracity Communications and a business have a contractual relationship, and the business has access to a dedicated account representative, the authentication processes used by the parties may be different and notifications might not be sent.

Questions or Comments. The Company has always been committed to safeguarding customer information. Our compliance with the new FCC rules is merely a continuation of our long-standing practices. If you have questions about this notice or about our specific commitment to the protection of your information, please contact us at 801-379-3000.

Veracity Communications

STATEMENT EXPLAINING HOW THE COMPANY'S OPERATING PROCEDURES ENSURE COMPLIANCE WITH THE FCC'S CPNI RULES

PREFATORY STATEMENT:

During 2009, Veracity Communications did not utilize or provide CPNI for any purpose other than those purposes that are permissible without customer approval in accordance with 47 CFR §64.2005 of the FCC's Rules and Regulations. *Veracity Communications does send annual opt-out notices meeting the requirements of 47 CFR § 64.2007 (see attached Exhibit A). The status of individual customer CPNI approval is evidenced in Veracity Communications' customer account and billing database which flags the account and individual lines (where applicable) with CPNI approval status. Veracity Communications has elected not to utilize or provide CPNI for any purposes requiring express or opt-in approval.*

I. Customer Proprietary Network Information ("CPNI")

The law affords privacy protections for two kinds of information related to Veracity Communications as a telecommunications carrier: (1) information about the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer, and (2) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer.

That information, when matched to a name, address, and telephone number is known as "Customer Proprietary Network Information or "CPNI" for short. Examples of CPNI include information typically available from telephone-related details on a monthly bill such as the types of services purchased by a customer, numbers called, duration of calls, directory assistance charges, and calling patterns. (CPNI does not include names, addresses, and telephone numbers, as this information is considered subscriber list information under applicable law.

II. Use of CPNI Is Restricted

Veracity Communications recognizes that CPNI privacy concerns have led Congress and the FCC to impose restrictions upon its use and disclosure, and upon the provision of access to it by individuals or entities inside and outside our company.

Veracity Communications has designated its Vice President of Customer Service as the CPNI Compliance Officer responsible for: (1) communicating with our company attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of company employees and agents who use or have access to CPNI; and (3) receiving, reviewing, and resolving any questions or issues arising within our company regarding use, disclosure, or provision of access to CPNI; including but not limited to specific marketing by Veracity Communications and its affiliates.

Company employees and agents that may deal with CPNI have been informed that there are substantial federal restrictions upon CPNI use, distribution and access. In order to be authorized to use or access the company's CPNI, employees and agents must receive training with respect to the requirements of Section 222 of the Communications Act and the FCC's CPNI Rules (Subpart U of Part 64 of the FCC Rules).

III. Permissible Uses of CPNI

Veracity Communications employees and agents are strictly prohibited from using CPNI, and from providing CPNI to individuals or entities inside or outside the company, except as follows:

1. Veracity Communications may, after receiving an appropriate request from a customer, disclose or provide the customer's CPNI to any person or entity designated by the customer. Any and all such customer requests: (1) must be made in writing; (2) must include the customer's correct billing name and address and telephone number; (3) must specify exactly what type or types of CPNI must be disclosed or provided; (4) must specify the time period for which the CPNI must be disclosed or provided; and (5) must be signed by the customer.

2. In the absence of an appropriate written request from the customer, Veracity Communications may still provide the customer's phone records or other CPNI to a law enforcement agency in response to a warrant or subpoena that specifies the particular CPNI to be furnished.

3. Veracity Communications may use, disclose or permit access to CPNI to provide the same category of telecommunications service to a customer from which the CPNI is derived. For example, we may use the CPNI from our provision of local exchange service to a customer to provide or market new, additional or modified local exchange service offerings to the customer. Likewise, we may use the CPNI from our provision of long distance toll service to a customer to provide or market new, additional or modified long distance toll service offerings to the customer.

4. Veracity Communications and its authorized employees may use, disclose or permit access to CPNI to provide services necessary to, or used in, the provision of the telecommunications service from which the CPNI is derived.

a. The FCC has noted the publishing of directories as an example of this permitted use.

b. The FCC has indicated that telecommunications carriers may use, disclose or permit access to CPNI, without customer approval, to provide inside wiring installation, maintenance, and repair services. In these instances, CSR, Network engineer, technician, and dispatcher employee involvement with CPNI is utilized within the FCC guidelines.

c. The FCC has stated that local exchange carriers and commercial mobile radio service providers may use CPNI, without customer approval, to market "adjunct-to-basic" services such as speed dialing, computer-provided directory assistance,

call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.

d. Any other use, disclosure or provision of CPNI under this "necessary to or used in the provision of" category must be expressly approved in writing by Veracity Communications' CPNI Compliance Officer.

5. Veracity Communications, its authorized employees and its billing agent may use CPNI to initiate, render, bill, and collect for telecommunications services. Such use may include periodic review of customer statements for accuracy and completeness.

6. Veracity Communications may use CPNI to protect company rights or property, and to protect users and other carriers from fraudulent, abusive or illegal use of (or subscription to) the telecommunications service from which the CPNI is derived.

7. Veracity Communications may use, disclose, or permit access to CPNI derived from its provision of local exchange service or interexchange service, without the customer's approval, to provide customer premises equipment ("CPE"), call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

8. If a customer subscribes to more than one category of service offered by Veracity Communications, we are permitted to share CPNI among its affiliated entities that provide a service offering to the customer. If a customer does not subscribe to more than one offering, Veracity Communications is not permitted to share CPNI with its affiliates without the customer's consent pursuant to the notice and approval procedures set forth in 47 CFR § 64.2007, 47 CFR § 64.2008 and 47 CFR § 64.2009 of the FCC's Rules.]

9. When an existing customer calls Veracity Communications to inquire about or order new, additional or modified services (in-bound marketing), we may use the customer's CPNI to assist the customer for the duration of the customer's call based upon opt-out approval. In the absence of opt-out approval the Veracity Communications will proceed with the use of customer CPNI only after the customer is provided with oral notice required by 47 CFR § 64.2008(c) and 47 CFR § 64.2008(f) of the FCC's Rules, and only if provided with positive ID or account password. This one-time oral approval is documented on the customer account and does not replace the existing CPNI account status unless the customer requests such change.

10. Veracity Communications has adopted a policy that it will limit the use, disclosure, or access to CPNI in connection with company (and affiliate) initiated marketing to those expressly allowed by 47 CFR § 64.2007 by opt-out authority only. Veracity Communications will not utilize CPNI for purpose requiring express or opt-in approval.

IV. CPNI Compliance Officer

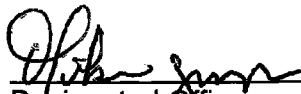
In addition to the specific matters required to be reviewed and approved by Veracity Communications' CPNI Compliance Officer, employees and agents are strongly encouraged to bring any and all other questions, issues or uncertainties regarding the use, disclosure, or access to CPNI to the attention of the our Compliance Officer for

appropriate investigation, review and guidance. The extent to which a particular employee or agent brought a CPNI matter to the attention of the CPNI Compliance Officer and received appropriate guidance is a material consideration in any disciplinary action brought against the employee or agent for impermissible use, disclosure or access to CPNI.

V. Disciplinary Procedures

Veracity Communications has informed its employees and agents that it considers compliance with the Communications Act and FCC Rules regarding the use, disclosure, and access to CPNI to be very important.

Violation by company employees or agents of such CPNI requirements will lead to disciplinary action (including remedial training, reprimands, unfavorable performance reviews, probation, and termination), depending upon the circumstances of the violation (including the severity of the violation, whether the violation was a first time or repeat violation, whether appropriate guidance was sought or received from the CPNI Compliance Officer, and the extent to which the violation was or was not deliberate or malicious).



Designated Officer
Veracity Communications